

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

A.J. and Q.C.,	:	
	:	
Plaintiffs,	:	
	:	CIVIL ACTION FILE NO.
v.	:	1:23-cv-04247-JPB
	:	
MASP, LLC,	:	
	:	
Defendant.	:	
	:	

**JOINT MOTION TO AMEND THE SCHEDULING ORDER TO INCLUDE
EXPERT DISCOVERY**

COMES NOW, Plaintiffs A.J. and Q.C. and Defendant MASP, LLC, by and through their undersigned counsel, respectfully move this Court to amend the Scheduling Order to include an expert discovery period, and in support thereof, show as follows:

1.

The discovery period commenced on November 16, 2023.

2.

On March 28, 2024, the parties filed a Joint Motion for Extension of Deadlines in the Scheduling Order (Doc. No. 34). The motion requested that the Court include expert discovery, with expert disclosures and reports due on September 13, 2024, and rebuttal expert disclosures due on October 11, 2024.

3.

On April 2, 2024, the Court partially granted the parties' Joint Motion for Extension of Deadlines in the Scheduling Order. The Court ordered the parties to complete all discovery by August 14, 2024.

4.

The parties have conferred and agreed that the inclusion of expert discovery is necessary for the resolution of this case. Therefore, the parties respectfully request that this Honorable Court grant this additional request to include expert discovery and amend the scheduling order as follows:

- (a) The parties' expert disclosures to be served on September 13, 2024;
- (b) Rebuttal expert disclosures to be served on October 11, 2024; and
- (c) Dispositive motions and Daubert motions to be filed by November 8, 2024.

5.

At this time, the parties do not anticipate any further requests for amendments to the Scheduling Order.

Respectfully submitted this 26th day of July, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

Patrick J. McDonough

Georgia Bar No. 489855

pmcdonough@atclawfirm.com
Jonathan S. Tonge
Georgia Bar No. 303999
jtonge@atclawfirm.com
Jennifer M. Webster
Georgia Bar No. 760381
jwebster@atclawfirm.com
Attorneys for Plaintiffs

One Sugarloaf Centre
1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
(770) 822-0900 | Telephone
(770) 236-9784 | Facsimile

SWIFT, CURRIE, McGHEE & HIERS

/s/ Kori E. Wagner

Kori E. Wagner
Georgia State Bar No. 155438
kori.wagner@swiftcurrie.com
Marissa H. Merrill
Georgia State Bar No. 216039
marissa.merrill@swiftcurrie.com
Tracy A. Gilmore
Georgia State Bar No. 633193
tracy.gilmore@swiftcurrie.com
Attorneys for Defendant

1420 Peachtree Street, N.E., Suite 800
Atlanta, Georgia 30309
(404) 888-6162 | Telephone
(404) 888-6199 | Facsimile

CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed a true and correct copy of the within and foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send an e-mail notification of such filing to all counsel of record.

Respectfully submitted this 26th day of July, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

Patrick J. McDonough

Georgia Bar No. 489855

pmcdonough@atclawfirm.com

Jonathan S. Tonge

Georgia Bar No. 303999

jtonge@atclawfirm.com

Jennifer M. Webster

Georgia Bar No. 760381

jwebster@atclawfirm.com

Attorneys for Plaintiffs

One Sugarloaf Centre
1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
(770) 822-0900 | Telephone
(770) 236-9784 | Facsimile

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

Respectfully submitted this 26th day of July, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

Patrick J. McDonough

Georgia Bar No. 489855

pmcdonough@atclawfirm.com

Jonathan S. Tonge

Georgia Bar No. 303999

jtonge@atclawfirm.com

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Georgia Bar No. 760381

jwebster@atclawfirm.com

Attorneys for Plaintiffs

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Duluth, Georgia 30097
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